

# EXHIBIT A

**MARCH 15, 2021**

the systems platforms group.<sup>32</sup> The systems platform group makes up a small portion of the Technology Solutions revenue and operating profit.<sup>33</sup>

29. The focus of FNC's business is communication networks.<sup>34</sup> FNC's product portfolio includes products grouped as 5G RAN and transport, compact modular optical networking, network management, control and automation, and traditional packet optical and OTN.<sup>35</sup> The accused products, Flashwave 9500 and 7500, are categorized under the last group, traditional packet optical and OTN.<sup>36</sup> The company's customers include enterprises, national service providers, utility companies, and federal, state and local government.<sup>37</sup>
30. Fujitsu states that it was the first vendor to develop and deploy ROADM technology in 2003, as well as the first to incorporate a WSS-based optical switch fabric.<sup>38</sup> According to Fujitsu, "the keys to any ROADM are the optical switch fabric and optical switching technology. Fujitsu employs an advanced...(WSS) module as our optical switching 'engine'."<sup>39</sup>
31. FNC first introduced the Flashwave 7500 ROADM in 2003.<sup>40</sup> Approximately four years later, in 2007, Fujitsu introduced the Flashwave 9500 Packet Optical

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<sup>32</sup> Fujitsu Group, Integrated Report 2019, p. 9.

<sup>33</sup> Fujitsu Group, Integrated Report 2019, p. 9.

<sup>34</sup> Fujitsu Network Communications, "Products." Available at <https://www.fujitsu.com/us/products/network/products/>.

<sup>35</sup> Fujitsu Network Communications, "Products." Available at <https://www.fujitsu.com/us/products/network/products/>.

<sup>36</sup> Fujitsu Network Communications, "Products." Available at <https://www.fujitsu.com/us/products/network/products/>.

<sup>37</sup> Fujitsu Network Communications, "Corporate Profile." p. 6. Available at <https://www.fujitsu.com/us/Images/CorporateProfile.pdf>.

<sup>38</sup> Fujitsu, "ROADM / WSS." Available at <https://www.fujitsu.com/us/products/network/technologies/roadmwss/index.html>.

<sup>39</sup> Fujitsu, "ROADM / WSS." Available at <https://www.fujitsu.com/us/products/network/technologies/roadmwss/index.html>.

<sup>40</sup> Fujitsu Network Communications, "Corporate Profile." p. 7. Available at <https://www.fujitsu.com/us/Images/CorporateProfile.pdf>.

Networking Platform as “a modular integration of Ethernet, ROADM, and SONET transport technologies on a single addressable optical networking class element”.<sup>41</sup>

32. The Flashwave 7500 is noted to be a Fujitsu product milestone, and Fujitsu states that it “served to support the Internet’s backbone”.<sup>42</sup> Five years after it was introduced, it attained a top share of the U.S. market in 2008.<sup>43</sup> Today, the product is described on Fujitsu’s website as:  
“The FLASHWAVE 7500 optical transport system is the global superhighway for flexible high bandwidth service delivery. It offers the most advanced DWDM, Optical hubbing, ROADM, and network design capabilities to deliver and manage growing metro and regional networks.”<sup>44</sup>
33. The Flashwave 9500 is also noted to be a Fujitsu product milestone, which Fujitsu describes as combining two functions, a packet processor and a digital multiplex processor, that had previously been carried out by separate machines and thus, the Flashwave 9500 is “a pioneering tool in the telecommunications industry.”<sup>45</sup>
34. In 2008, FNC moved a majority of the work on two products, the Flashwave 4500 and the Flashwave 7500, from Japan to Richardson.<sup>46</sup> At that point in time, the company also took over manufacturing broadband and fiber-access products from a sister company.<sup>47</sup> In the first quarter of 2008, the Flashwave 7500 achieved

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<sup>41</sup> Fujitsu Network Communications, “Corporate Profile.” p. 7. Available at <https://www.fujitsu.com/us/Images/CorporateProfile.pdf>.

<sup>42</sup> Fujitsu, “FLASHWAVE7500 Multifunction ROADM/DWDM Platform (2003).” Available at <https://www.fujitsu.com/global/about/corporate/history/products/communication/transmission/flashwave7500.html>.

<sup>43</sup> Fujitsu, “FLASHWAVE7500 Multifunction ROADM/DWDM Platform (2003).” Available at <https://www.fujitsu.com/global/about/corporate/history/products/communication/transmission/flashwave7500.html>.

<sup>44</sup> Fujitsu, “FLASHWAVE 7500 Metro/Regional Multiservice ROADM.” Available at <https://www.fujitsu.com/us/products/network/products/flashwave-7500/>. Note that this webpage states that the page is archived content and the content likely to be out of date.

<sup>45</sup> Fujitsu, “FLASHWAVE9500 Packet Optical Networking Platform (2008).” Available at <https://www.fujitsu.com/global/about/corporate/history/products/communication/transmission/flashwave9500.html>.

<sup>46</sup> Jeff Bounds, “Fujitsu overseas production moves to Richardson site.” Dallas Business Journal, July 27, 2008. Available at <https://www.bizjournals.com/dallas/stories/2008/07/28/story6.html>.

<sup>47</sup> Jeff Bounds, “Fujitsu overseas production moves to Richardson site.” Dallas Business Journal, July 27, 2008. Available at <https://www.bizjournals.com/dallas/stories/2008/07/28/story6.html>.